

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

	X	
BRICKLAYERS' & ALLIED	:	Civil Action No. 1:22-cv-01014-VM
CRAFTWORKERS LOCAL #2 ALBANY,	:	
NY PENSION FUND, Individually and on	:	<u>CLASS ACTION</u>
Behalf of All Others Similarly Situated,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
NEW ORIENTAL EDUCATION &	:	
TECHNOLOGY GROUP INC.,	:	
CHENGGANG ZHOU, MICHAEL	:	
MINHONG YU and ZHIHUI YANG,	:	
	:	
Defendants.	:	
	:	
	X	
ANDRES MIJARES-ORTEGA, Individually	:	Civil Action No. 1:22-cv-01876-VM
and on Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
NEW ORIENTAL EDUCATION &	:	
TECHNOLOGY GROUP INC.,	:	
CHENGGANG ZHOU, MICHAEL	:	
MINHONG YU and ZHIHUI YANG,	:	
	:	
Defendants.	:	
	X	

NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF,  
AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that proposed lead plaintiff, Pavers & Road Builders District Council Pension Fund (the “Pension Fund”), will move this Court, on a date and time as may be designated by the Court, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order pursuant to the Private Securities Litigation Reform Act of 1995 consolidating the above-captioned related actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, appointing the Pension Fund as Lead Plaintiff, and approving its selection of Robbins Geller Rudman & Dowd LLP as lead counsel for the putative class. The Pension Fund’s Motion is based on the accompanying Memorandum of Law and Declaration of David A. Rosenfeld.

DATED: April 5, 2022

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD

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*s/ David A. Rosenfeld*  
DAVID A. ROSENFELD

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Proposed Lead Counsel for Proposed Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 5, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ David A. Rosenfeld

DAVID A. ROSENFELD

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# **Mailing Information for a Case 1:22-cv-01014-VM Bricklayers' & Allied Craftworkers Local #2 Albany, NY Pension Fund v. New Oriental Education & Technology Group Inc. et al**

## **Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Phillip C. Kim**  
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- **Samuel Howard Rudman**  
srudman@rgrdlaw.com,e\_file\_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e\_file\_sd@rgrdlaw.com

## **Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)